

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA

v.

ROMEO DISTASIO

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Criminal No. 04-10261-DPW

**EMERGENCY MOTION TO TEMPORARILY MODIFY A CONDITION OF  
DEFENDANT'S PROBATION**

\_\_\_\_\_ Now comes the Defendant, Romeo Distasio and hereby respectfully requests this Honorable Court to temporarily modify a condition of his probation, relative to the restriction on his travel outside of Massachusetts for the following reason.

Mr. Distasio's mother-in-law and father-in-law, Mr. & Mrs. Cadieux, are celebrating their Fiftieth Wedding Anniversary. To celebrate this occasion, Mr. & Mrs. Cadieux has planned and paid for a family vacation for their entire family, including their children; their children's spouses; and grandchildren. This family trip begins **tomorrow, December 9, 2006**, culminating with a cruise on Carnival Cruise Lines departing from Tampa Florida with stops in the Grand Cayman Island and Calica Mexico.

Mr. Distasio and family are scheduled to leave tomorrow on a 4:30 a.m. flight on Southwest Airline from Manchester, NH to Tampa, FL. The cruise departs tomorrow afternoon at 4 p.m. The cruise returns to Tampa, FL on Thursday, December 14, 2006 at 6:30 p.m. Mr. Distasio and family have a hotel room reservation for the evening of December 14, 2006 at the Clarion Hotel located at 2701 E. Fowler Avenue, Tampa FL. Mr. Distasio and family have a return flight from Tampa, FL to Manchester, NH on December 15, 2006. From there Mr.

Distasio, if allowed to travel, would return with his family to his home in North Reading, MA.

Mr. Distasio sought permission to enter both Grand Cayman and Calica Mexico. First, Mr. Distasio in writing notified the Consulate General of Mexico of his probationary status and his desire to travel to the Grand Cayman. The Consulate's office granted Mr. Distasio permission to visit Calica, Mexico. Apparently, Mr. Distasio attempted to obtain the same permission from the consulate's office for the Grand Cayman. However, he was informed that Grand Cayman does not yet have a consulate in office.

Wherefore, Mr. Distasio prays that this Honorable Court allow him a **temporary modification from December 9, 2006 until December 16, 2006** of the condition of his probation which restricts his travel.

ROMEO DISTASIO

By his attorney:

/s/Sean T. Delaney

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Dated: December 8, 2006